

LAW OFFICE OF JOSE A. CORDOVA
JOSE A. CORDOVA (State Bar No. 201243)
jac@cordova-lawfirm.com
One Sansome St., Suite 3500
San Francisco, CA 94104
Telephone No.: 415.463.8322
Direct Dial No.: 415.466.8211
Fax No.: 415.276.5880

Attorneys for Defendant
JIM SLATTERY and FEDERAL MEDICAL
SERVICES, INC.

GOLDBERG & LOREN, P.A.
ZAC STOLTZ (SBN 341232)
zstoltz@goldbergloren.com
JAMES LOREN, (pro hac vice) (SBN 55409)
jloren@goldbergloren.com
11755 Wilshire Blvd,
STE 1250
Los Angeles, CA 90025
Phone: (800) 719-1617

Attorneys for Plaintiff
ALEXANDER RUSSO

UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ALEXANDER RUSSO, an individual,

Plaintiff,

v.

FEDERAL MEDICAL SERVICES, INC, a
Texas corporation; ROSEMARK SERVICES,
LLC, a Texas corporation, RENHILL
STAFFING SERVICES OF TEXAS, INC., a
Texas corporation, JIM SLATTERY, an
individual; ABIGAIL WOULFE, an
individual; JERRY TATE, an individual,
CHAD WEBSTER, an individual, and DOES,
1-25, inclusive,

Defendant.

Case No. 5:24-cv-00748SVK

**STIPULATION FOR FILING OF
PLAINTIFF'S SECOND AMENDED
COMPLAINT**

Hon. P. Casey Pitts

Complaint Filed: October 9, 2023
First Amended Complaint Filed: October 26,
2023

1
2 1. WHEREAS, On March 13, 2024, Defendants Jim Slattery and Federal Medical
3 Insurance, Inc. ("Defendants") filed a Rule 12(b)(6) Motion to Dismiss Plaintiff Alexander
4 Russo's First Amended Complaint;

5
6 2. WHEREAS, Plaintiff Russo filed a Second Amended Complaint on March 26,
7 2024, while Defendants Motion to Dismiss is Pending;

8
9 3. WHEREAS, a genuine dispute has arisen between Defendants and Plaintiff (the
10 "Parties") as to whether Plaintiff's filed Second Amended Complaint violates FRCP 15, and
11 whether Plaintiff is required to seek leave to amend to file his Second Amended Complaint;

12
13 4. WHEREAS, the Parties seek to resolve the issue without additional motion work;

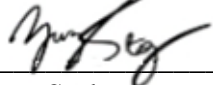
14
15 THE PARTIES HEREBY AGREE AS FOLLOWS:

16
17 5. Plaintiff's Second Amended Complaint shall be deemed filed as of March 26,
18 2024.

19 IT IS SO STIPULATED.

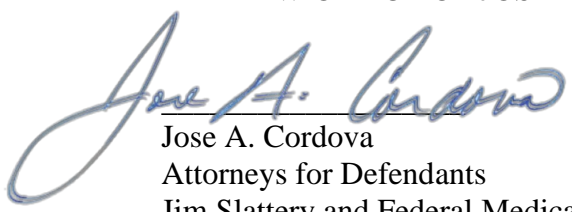
20
21 Dated: March 28, 2024

GOLDBERG & LOREN, P.A.

22 
23 _____
24 Zachary Stoltz
Attorneys for Plaintiff
Alexander Russo

25 Dated: March 28, 2024

THE LAW OFFICE OF JOSE A. CORDOVA

26 
27 _____
28 Jose A. Cordova
Attorneys for Defendants
Jim Slattery and Federal Medical, Inc.

PROOF OF SERVICE

[C.C.P. §§ 1011 and 1013, C.R.C. § 2008]

I declare that I am employed in the City and County of San Francisco, California, in the office of a member of the bar of this Court at whose direction this service was made. I am over the age of eighteen years and not a party to this action. My business address is One Sansome St., Ste., 3500, San Francisco, California 94104.

I served the following document entitled: **STIPULATION AND FOR FILING OF PLAINTIFF'S SECOND AMENDED COMPLAINT** on the interested parties in this action, as follows:

Zac Stoltz
Goldberg & Loren, P.A.
11755 Wilshire Blvd., Suite 1250
Los Angeles, CA 90025

Tel.: 800-710-1617, Ext. 2161
Fax: 888-272-8822
Email: zstoltz@goldbergloren.com

☐ [By First Class Mail] I am readily familiar with my employer's practice for collecting and processing documents for mailing with the United States Postal Service. On the date listed herein, following ordinary business practice, I served the within document(s) at my place of business, by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, for collection and mailing with the United States Postal Service where it would be deposited with the United States Postal Service that same day in the ordinary course of business.

☐ [By Overnight Courier] I caused each envelope to be delivered by a commercial carrier service for overnight delivery to the offices of the addressee(s).

☐ [By Hand] I directed each envelope to the party(ies) so designated on the service list to be delivered by courier this date.

☐ [By Facsimile Transmission] I caused said document to be sent by facsimile transmission to the fax number indicated for the party(ies) listed above.

☒ [By Electronic Transmission] I caused said document to be sent by electronic transmission to the e-mail address indicated for the party(ies) listed above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on March 28, 2024.


Jose A. Cordova